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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GABRIEL SETH ELSTEIN, ET AL.,

Defendants.

Case No. 2:18CR00099 CW

SECOND BILL OF PARTICULARS

Judge Clark Waddoups

The United States of America hereby files the following First Bill of Particulars for Forfeiture of Property.

The United States hereby gives notice that in accordance with its Notice of Intent to Seek Forfeiture in the Indictment, the United States provides the following updated list of assets for which it seeks forfeiture under 18 U.S.C. § 982(a)(1) and 21 U.S.C. § 853:

- Real Property located at 536 West 100 South, Salt Lake City, Utah;
- Proceeds from the interlocutory sale of Real Property located at 7467 Tall Oaks Circle, Park City, Utah;
- Real Property located at 4269 Hilltop Drive, Park City, Utah;
- Real Property located at 6639 Wishing Well Way, Loomis, California 95690;
- A diamond that ELSTEIN paid \$70,000 in cash for in 2010;

- All shares of stock owned by Gabriel Elstein and Angela Elstein in Dumbles Enterprises, Inc., a Utah corporation (the "Corporation"), together with all subsidiary companies of Dumbles Enterprises, Inc., including Complex Entertainment, LLC, Complex Management, LLC, The Complex LLC, The Complex Live, LLC, Vertigo, LLC, Vivaz, LLC, and all other subsidiary companies; and any right, title, interest, and claim to the revenues, income, profits, receipts, and assets of the Corporation, of every kind and description, due or to become due, now existing or hereafter acquired by the Corporation relating to such shares;

- All shares of stock owned by Gabriel Elstein and Angela Elstein in Dumbles Holdings, LLC, and any right, title, interest, and claim to the revenues, income, profits, receipts, and assets of the Dumbles Holdings, LLC, of every kind and description, due or to become due, now existing or hereafter acquired by the Dumbles Holdings, LLC, relating to such shares;

- a MONEY JUDGMENT equal to the value of all property involved in the money laundering and any property traceable to such property that is not available for forfeiture for one or more of the reasons listed in 21 U.S.C. § 853(p) as a result of any act or omission of the defendant(s).

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty,
- the United States of America shall be entitled to forfeiture of substitute property pursuant to 21

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U.S.C. §853(p) and 18 U.S.C. § 982(b).

Dated this 19th day of July, 2022.

TRINA A. HIGGINS
United States Attorney

/s/ Cy H. Castle
CY H. CASTLE
Assistant U.S. Attorney